

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDAV CAPITAL, NISHA DESAI,

Plaintiffs,

vs.

PAYPAL HOLDINGS, INC., PAYPAL
VENTURES,

Defendants.

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Case No. 1:25-cv-00033-JMF

NOTICE OF DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT

PLEASE TAKE NOTICE that Defendants PayPal Holdings, Inc. and PayPal Ventures (collectively, the “Defendants”), pursuant to Federal Rule of Civil Procedure 12(b)(6), move this Court for an order dismissing the claims against them with prejudice for failure to state a claim under 42 U.S.C. § 1981, the Equal Credit Opportunity Act (“ECOA”), the New York State Human Rights Law (“NYSHRL”), or the New York City Human Rights Law (“NYCHRL”), among other reasons. In support of their Motion, Defendants will rely upon Defendants’ Memorandum of Law in Support of their Motion to Dismiss Plaintiffs’ Amended Complaint, dated May 28, 2025, and on the prior pleadings and proceedings in this case.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request that oral argument on this motion be held on a date and at a time designated by the Court.

Dated: May 28, 2025

Respectfully submitted,

By: /s/ Mylan L. Denerstein

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